

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Daniel Ryan McGough,
Plaintiff,

v.

WASHTENAW COUNTY, *a Michigan municipal corporation, et al.*
Defendants

Case: 2:25-cv-11226
Assigned To : Michelson, Laurie J.
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 4/29/2025
Description: CMP DANIEL RYAN MCCOUGH V
WASHTENAW COUNTY (SS)

**COMPLAINT FOR EMERGENCY DECLARATORY AND INJUNCTIVE
RELIEF, DAMAGES, AND OTHER EQUITABLE RELIEF**

UNDER 42 U.S.C. §§ 1983, 1985, 2201, 2202, and the ALL WRITS ACT
FOR SYSTEMATIC VIOLATIONS OF PLAINTIFF'S CONSTITUTIONAL RIGHTS,
MALICIOUS PROSECUTION, UNLAWFUL DEPRIVATION OF LIBERTY,
AND INTERFERENCE WITH FAMILIAL RELATIONS

JURY TRIAL DEMANDED

I. Introduction

1. Overview of the Case

This case revolves around a systematic pattern of abuse of power and rights violations perpetrated by law enforcement and judicial officials in Washtenaw County, Michigan. The plaintiff, Daniel Ryan McGough, brings this action under 42 U.S.C. § 1983 to seek redress for ongoing constitutional violations stemming from two distinct but deeply intertwined legal matters: a felony criminal case (25-75-FH) and a family court custody dispute (19-2734-DC). This cross-contamination of proceedings resulted in a cascading series of constitutional violations, including unlawful arrest, malicious prosecution, and deprivation of parental rights without due process. Rather than operating as separate and impartial forums, the criminal and family court systems functioned in concert to deprive Plaintiff of his liberty, reputation, and parental relationship, all while cloaked in the appearance of legitimate judicial processes.

Plaintiff brings this action to expose and remedy these intertwined abuses, which have left him effectively

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barred from defending himself in either case. Plaintiff seeks equitable relief under 42 U.S.C. § 1983 and this Court's inherent equitable powers, including declaratory relief to recognize and clarify his constitutional rights, and injunctive relief to restore and protect his rights moving forward. Plaintiff seeks equitable remedies to prevent further violations, including restoration of his parental rights, protection of the child's welfare, and the cessation of retaliatory or unlawful actions by the defendants. The use of criminal allegations as a strategic tool to control family court outcomes—without regard for due process **or truth**—demonstrates a broader institutional failure that implicates multiple defendants, involving judicial officers, prosecutors, law enforcement, and private actors who misused state powers for personal gain.

2. **The Felony Case – Washtenaw County Circuit Court – Case No. 25-75-FH**

On October 11, 2024, Plaintiff was unlawfully arrested by officers of the Ypsilanti Police Department without a warrant, probable cause, or reasonable suspicion. This arrest was part of a broader pattern of police misconduct involving fabricated charges post hoc—including an alleged assault on a police officer—and the suppression of exculpatory evidence, following which lead to a retaliatory move by the presiding judge, acting *sua sponte*, compounding two additional felony assault charges to the case on February 11, 2025. These actions, driven by improper motivations, have resulted in ongoing legal jeopardy for Plaintiff, including an *active* arrest warrant as of April 10, 2025.

3. **The Family Case – Washtenaw County Trial Court – Case No. 19-2734-DC**

Concurrently, Plaintiff's family court case has been deeply affected by the same unconstitutional actions. Patrick Joseph Conlin's decision to suspend Plaintiff's parental rights was directly influenced by the flawed felony charges he oversaw as Chief judge of Washtenaw County. Plaintiff was not afforded the opportunity to challenge or address the fabricated evidence in the family court proceedings before Conlin conspired with other defendants to deprive Plaintiff of access to his child. The McCloskey family—private individuals with a vested interest in the custody dispute—knowingly submitted false emergency reports to law enforcement and the judiciary in a deliberate effort to trigger state action and undermine Plaintiff's parental rights without due process. These actions, coupled with the misconduct by both law enforcement and the judiciary, have resulted in the unlawful interference with Plaintiff's relationship with his child, causing ongoing harm to his familial and parental rights.

Acknowledgment of Litigant's Efforts and Good Faith

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4. The Plaintiff, Daniel Ryan McGough, respectfully submits this complaint with full acknowledgment of his position as a pro se litigant. While Plaintiff is not a trained attorney, he is dually sworn to the truth of all statements presented herein and affirms that the facts contained within this document are accurate to the best of his knowledge and belief. Plaintiff further acknowledges the inherent limitations of his abilities in the formal legal processes and procedures, but has made every effort to approach this case with diligence, honesty, and in good faith.
5. The Plaintiff is fully aware of the complexities and procedural nuances of the law, and while he may not always be able to express his arguments with the precision of an experienced attorney, he believes that the gravity of the constitutional violations at issue and the urgent need for redress justify this action. His intent is solely to seek a fair remedy for the ongoing, unlawful actions that have infringed upon his constitutional rights, including his fundamental right to be a parent to his child, and his right to due process of law.
6. It is in this spirit that Plaintiff submits this complaint, not as an attempt to evade any responsibility or shortcomings on his part, but rather as a good-faith effort to expose the systemic abuses and violations that have occurred. Plaintiff respectfully requests this Court's understanding of his position and seeks the Court's assistance in restoring his rights and rectifying the injustices described herein.

II. Jurisdiction and Venue

7. Subject Matter Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3), as this action arises under the laws of the United States, including claims brought under 42 U.S.C. § 1983 for violations of Plaintiff's federally protected constitutional rights, including the First, Fourth, and Fourteenth Amendments.
8. This Court also has supplemental jurisdiction over Plaintiff's related state law claims pursuant to 28 U.S.C. § 1367(a), as they form part of the same case or controversy.
9. Jurisdiction for declaratory and injunctive relief is proper under 28 U.S.C. §§ 2201 and 2202, as well as for a writ of habeas corpus or other extraordinary relief under the All Writs Act, 28 U.S.C. § 1651.
10. Venue is proper in the Eastern District of Michigan under 28 U.S.C. § 1391(b), as the events or omissions giving rise to the claims occurred within this district, and all Defendants reside or are employed within this jurisdiction.
11. Plaintiff seeks emergency preliminary injunctive relief pursuant to Federal Rule of Civil Procedure 65 and the All Writs Act, as he is currently subject to ongoing and irreparable harm, including continued loss of liberty, obstruction of parental rights, and interference with employment opportunities. These harms are a

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direct result of actions taken by the Defendants in bad faith, which violate Plaintiff's clearly established constitutional rights.

- Federal intervention is both necessary and appropriate in this case under the well-established exceptions to the Younger abstention doctrine, as articulated in *Younger v. Harris*, 401 U.S. 37 (1971), and *Middlesex County Ethics Comm'n v. Garden State Bar Ass'n*, 457 U.S. 423 (1982).

12. Specifically, abstention is unwarranted where:

- Plaintiff faces immediate and irreparable harm, including loss of liberty, parental rights, and livelihood, which no state court remedy can adequately or timely address;
- No adequate or impartial forum exists within the state judicial system to vindicate Plaintiff's federal rights, as demonstrated by repeated procedural roadblocks and retaliatory conduct by state actors.
- State proceedings are being conducted in bad faith or for the purpose of harassment, particularly where officials use the machinery of the state court to shield themselves from accountability;

Here, each of these exceptions applies. Plaintiff has made good-faith attempts to seek redress in the Michigan state courts, including filing a writ of superintending control and a writ of mandamus — both appropriate avenues for correcting constitutional violations. Yet not only did these filings fail to produce any meaningful remedy, they triggered escalated retaliation by state officials with the intent on silencing or punishing Plaintiff for asserting his rights. The state judicial system has not only proven ineffective; it has become a vehicle for ongoing constitutional injury. In such circumstances, Younger abstention does not apply, and this Court has both the authority and the obligation to intervene to prevent further harm.

13. Plaintiff's claims against the private defendants are properly brought under 42 U.S.C. § 1985, as these individuals acted in concert with state actors to deprive Plaintiff of his constitutional rights. Specifically:

- **Conspiracy with State Actors:** Private individuals actively collaborated with government officials to initiate or sustain constitutional violations.
- **Intentional Misuse of Legal Process:** False reports and fabricated claims were knowingly used to trigger state action, aiming to cause harm.

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- **Class-Based or Retaliatory Animus:** Actions were motivated by discriminatory or retaliatory intent, targeting the plaintiff for exercising protected rights (e.g., parental, procedural, or First Amendment rights).
- **Resulting Constitutional Harm:** The conspiracy directly caused deprivations of federally protected rights, including due process, liberty, and familial association.
- **Legal Precedent Supports Liability:** Supreme Court and circuit case law (e.g., *Griffin v. Breckenridge*, *Dennis v. Sparks*) clearly allows § 1985 liability where private actors join with state officials to effectuate unlawful goals.

As such, Plaintiff's claims against named private individuals are valid under § 1985 and should proceed.

III. Parties

14. Plaintiff **Daniel Ryan McGough** is a natural person domiciled in Washtenaw County, Michigan. He brings this action as an individual whose constitutional rights under the Fourth, Fifth, Sixth, and Fourteenth Amendments have been repeatedly violated. Plaintiff is currently subject to a pending arrest warrant and continuing harm due to meritless criminal proceedings and associated collateral consequences, including deprivation of parental rights and interference with employment and housing.
15. Defendant **Washtenaw County** is a municipal corporation organized under the laws of the State of Michigan, responsible for operating the county jail, employing prosecutorial and judicial personnel, and overseeing the local criminal justice system. The County is a proper defendant as its policies, customs, and failures are directly responsible for the deprivation of Plaintiff's constitutional rights.
16. Defendant **Gregory Dill** is the Washtenaw County Administrator, named in his official capacity. He is responsible for oversight and management of county departments, including those implicated in the unconstitutional arrest, detention, and prosecution of Plaintiff.
17. Defendant **City of Ypsilanti** is a municipal corporation organized under Michigan law. The City operates the Ypsilanti Police Department and is liable for its customs, policies, training, and supervision failures that resulted in Plaintiff's unlawful seizure and constitutional deprivations.
18. Defendant **Chief Kirk Winter** is the Chief of Police of the Ypsilanti Police Department and is sued in his official capacity. He is responsible for establishing departmental policy and supervising subordinate officers, including Defendant Officer Tyson, whose unlawful conduct occurred under his watch.

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19. Defendant **Officer Darnell Tyson** is a law enforcement officer employed by the Ypsilanti Police Department, sued in both his individual and official capacities. Officer Tyson played a direct and personal role in effectuating Plaintiff's unconstitutional arrest, initiating a malicious prosecution, and fabricating or distorting material facts concerning the alleged incident.
20. Defendant **Eli Noam Savit** is the elected Prosecuting Attorney for Washtenaw County, sued in his official capacity. He is responsible for directing and supervising criminal prosecutions within the county and has authorized or failed to prevent ongoing bad-faith prosecution of Plaintiff despite exculpatory evidence.
21. Defendant **Ashley A. Londy** is an Assistant Prosecuting Attorney for Washtenaw County, sued in both her individual and official capacities. She is responsible for continuing Plaintiff's prosecution in bad faith, suppressing material evidence favorable to the defense, and leveraging criminal charges to interfere with Plaintiff's parental rights.
22. Defendant **Judge John Cedric Simpson** is a judicial officer in Washtenaw County, sued in his individual and official capacities. Judge Simpson presided over critical hearings in Plaintiff's criminal matter and failed to disclose material contradictions in the record, including witness retractions and body camera admissions. His rulings perpetuated the malicious prosecution of Plaintiff and directly contributed to the continuation of unconstitutional proceedings and interference with familial rights.
23. Defendant **Lisa Fusnik** is the Administrator of the 14A-1 District Court in Washtenaw County and is sued in her official capacity. Fusnik is responsible for administrative oversight and docket management at the district court level. Her omissions in court administration contributed to the unlawful delays, barriers to access, and continued violations of Plaintiff's rights to liberty and due process.
24. Defendant **Steven Matthews** is the Administrator of the 22nd Circuit Court in Washtenaw County and is sued in his official capacity. Matthews is responsible for administrative oversight and docket management at the district court level. His omissions in court administration contributed to the unlawful delays, barriers to access, and continued violations of Plaintiff's rights to liberty and due process.
25. Defendant **Takisha Mastin** is the Supervisory Clerk of the 22nd Circuit Court in Washtenaw County and is sued in both her individual and official capacities. In her administrative role, Mastin exercised direct authority over the docketing, filing, and procedural processing of court records in both Plaintiff's family law and criminal proceedings. Despite her obligation to maintain neutral and lawful administration of court access, Mastin knowingly obstructed Plaintiff's ability to file critical pleadings, delayed or refused the processing of time-sensitive motions, and thereby contributed materially to the denial of Plaintiff's due

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process rights. Her actions, under color of state law, enabled and perpetuated judicial misconduct and procedural abuse, compounding the harm to Plaintiff's liberty, parental rights, and access to redress.

26. Defendant **Judge Arianne Elizabeth Slay**, a judicial officer of the Washtenaw County Trial Court, is sued in both her individual and official capacities. Judge Slay presides over both Plaintiff's criminal and family court proceedings, using her authority in both arenas to exacerbate and reinforce constitutional violations in the other. She simultaneously authorized the unlawful suspension of Plaintiff's parental rights and the issuance of a bench warrant for his arrest, effectively participating in a coordinated effort to deprive him of both liberty and familial association under color of law. Her actions expedited prosecutorial objectives while obstructing Plaintiff's access to parental rights, highlighting a systemic abuse of judicial power that produced retaliatory outcomes and denied Plaintiff a fair and impartial forum in both cases.
27. Defendant **Judge Patrick Joseph Conlin Jr.** is the Chief Judge of the Washtenaw County Trial Court, sued in both his individual and official capacities. In his leadership role, Judge Conlin wielded considerable influence over judicial proceedings and court administration, which he used to reinforce unconstitutional practices. He issued an ex parte order against Plaintiff based on flawed premises and without evidentiary foundation or review, circumventing due process and effectively weaponizing the judiciary to impose punitive and retaliatory restrictions. His conduct not only caused immediate and lasting injury to Plaintiff's constitutional rights and liberties, but also set a damaging precedent that chilled access to justice and emboldened further misconduct by court officers under his authority.
28. Defendant **Alyssa Rachelle McCloskey**, upon information and belief, resides in Washtenaw County, Michigan. As a private individual acting in concert with state officials, she played a central and initiating role in a targeted campaign to deprive Plaintiff of his fundamental constitutional rights. McCloskey knowingly and willfully filed false emergency reports and submitted fabricated allegations—including unfounded claims of abuse and neglect—to law enforcement, Child Protective Services, and the family court, all with the calculated intent to provoke state intervention. Her actions were not only malicious and retaliatory, but part of a broader conspiracy designed to manipulate public power for private ends, constituting clear violations of Plaintiff's rights to due process, familial association, and reputation under the color of law.
29. Defendant **Scott Anthony McCloskey**, upon information and belief, also resides in Washtenaw County, Michigan. Acting in collaboration with Defendant Alyssa McCloskey and state actors, he knowingly participated in the orchestration and perpetuation of a malicious campaign aimed at severing Plaintiff's

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custodial and parental rights through deceit and judicial exploitation. By affirming, amplifying, and facilitating false narratives submitted to legal authorities, Scott McCloskey weaponized the judicial and law enforcement systems for personal and punitive purposes. His actions were not only deeply injurious to Plaintiff's rights and reputation but also constituted knowing participation in a scheme to pervert the justice system in violation of clearly established constitutional norms.

30. Defendants **John and Jane Does 1–10** are unknown individuals who, at all relevant times, acted under color of state law in furtherance of the unlawful arrest, detention, prosecution, and obstruction of Plaintiff's constitutional rights. These Respondents include yet-unidentified officers, court staff, jail personnel, and administrative actors whose actions materially contributed to the harms suffered by Plaintiff. Plaintiff reserves the right to amend this Complaint to include their true names and capacities once they are ascertained through discovery.

A. Unlawful Arrest and Fabricated Charges

31. On October 11, 2024, Plaintiff was unlawfully detained, searched, and arrested by Officers Tyson, Gibbs, and Smith of the Ypsilanti Police Department without any warrant, reasonable suspicion, probable cause, or exigent circumstances.

32. Prior to this seizure, Plaintiff was not suspected of any criminal activity, and the officers failed to articulate any lawful basis for initiating a stop, search, and arrest.

33. The first mention of any charge occurred long **after** Plaintiff was already detained and placed in the back of a patrol vehicle. Body-worn camera footage captures Sergeant Gibbs stating to other officers:

"So what we're going to do, we charge him, one, interfering.

Several times talked to him, he's out, whatever, refused to move, interfering."

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34. The vague and imprecise language reveals that no specific or articulable suspicion existed at the time of arrest, in direct violation of *Ybarra v. Illinois*, 444 U.S. 85 (1979), which prohibits arbitrary searches and seizures not based on individualized suspicion.

35. Only after this exchange did Officer Tyson interject with a new and uncertain allegation:

“Man, he kicked me – he tried to kick me in the nuts, bruh.”

36. This statement is inherently contradictory — shifting in a split moment from the definite “*he kicked me*” to the speculative “*he **tried** to kick me.*”

37. The inconsistency reveals that Officer Tyson’s vague and inconsistent allegation — introduced *only after* Plaintiff had already been detained — lacks the clarity and credibility required to support a criminal charge, especially one as serious as felony assault on an police officer.

38. Sergeant Gibbs then responded:

*“Oh, I didn’t know he kicked.
So that’s R&O right there.
So we can take him straight to jail at this point. Yep.”*

39. This sequence is significant. The charge of Resisting and Obstructing (R&O) was not based on contemporaneous conduct, but was instead concocted **after** Plaintiff was restrained — based solely on an offhand, uncertain, and casually delivered remark.

40. Plaintiff was not suspected of any crime at the time of his detention, and the charge of R&O was only levied after he was already detained and without any lawful basis for arrest.

41. This conduct violates both federal and Michigan law, as the officers escalated force without any suspicion of a crime or lawful reason to be involved. Under federal law, the use of force requires that officers be lawfully performing their duties. See *Graham v. Connor*, 490 U.S. 386 (1989). Similarly, Michigan law

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requires that officers be lawfully engaged in their duties to support charges of resisting or obstructing.

See *People v. Moreno*, 491 Mich. 38 (2012).

42. The common law right to reasonably resist an unlawful arrest is well-established, as affirmed in *Bad Elk v. United States*, 177 U.S. 529 (1900), and recognized in *U.S. v. Span*, 970 F.2d 573, 577 (9th Cir. 1992).

43. Body camera footage further undermines the prosecution's narrative. Minutes later, while speaking to another Officer and E.M.S., Officer Tyson tells an unprompted joke:

*"I got kicked, too. I'm hurting. No, I'm just joking. Ha-ha!
You've got to deal with me for the rest of the night."*

44. When E.M.S. followed up with a question about the night's events, Tyson remarked:

"It's been an entertaining night, nonetheless."

45. These comments reflect a dismissive and flippant attitude inconsistent with a legitimate assault allegation and reveal the charge to be retaliatory or pretextual.

46. Quicker than they just arrested Plaintiff and immediately after realizing his body camera was still recording, Officer Tyson abruptly turned it off.

47. The timing of this deactivation, immediately following self-contradictory remarks, supports an inference of consciousness of guilt.

48. These statements and omissions are materially exculpatory under *Brady v. Maryland*, 373 U.S. 83 (1963), but they were neither disclosed in a timely nor transparent manner.

49. Furthermore, the prosecution, as well as the Washtenaw County District and Circuit Courts, have refused to acknowledge their exculpatory nature.

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50. No physical evidence supported the assault claim. There were no reported injuries, photos, medical records. Despite the presence of multiple officers and EMS personnel. The only recorded evidence — Officer Tyson’s own words — contradicts the assault allegation.

51. At the February 11, 2025 evidentiary hearing, Officer Tyson could not identify any moment in the body camera footage when the alleged kick occurred, even after continuous review. This further confirms that the charge was fabricated.

52. The official incident reports submitted by the arresting officers stated, verbatim, that:

*“Daniel assaulted Ofc. Tyson by kicking him in the groin with his **right foot** after multiple warnings from Ofc. Tyson and officers on the scene.”*

53. This statement was repeated in identical language, structure, and punctuation across both reports — strongly suggesting they were written in coordination.

54. This type of synchronized reporting, particularly when used to justify an arrest, is recognized by federal courts as unconstitutional fabrication. See *Ricciuti v. N.Y.C. Transit Auth.*, 124 F.3d 123 (2d Cir. 1997).

55. The definitive nature of the language used in these reports — “assaulted... by kicking” — directly contradicts the uncertainty and casual delivery of the initial accusation on body-worn camera, where Officer Tyson said, “*he tried to kick me in the nuts, bruh,*” only to later joke, “*I’m just joking.*” The contrast between these conflicting accounts — one spontaneous and uncertain, the other formal and identical across multiple officers — supports Plaintiff’s assertion that the reports were retroactively falsified to justify an otherwise unlawful arrest.

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B. February 11, 2025 – Evidentiary Hearing

Compounding Charges, Suppression of Evidence & Retaliation

56. On October 11, 2024, the Washtenaw County Prosecutor's Office issued a felony complaint charging Plaintiff with one count under MCL 750.81(d) – Assaulting, Resisting, or Obstructing a Police Officer.
57. Assigned Case No.: 24F21389 under Defendant Simpson in Washtenaw County's 14A-1 District Court.
58. At the February 11, 2025 evidentiary hearing, Officer Smith and SGT Gibbs, while under oath, confirmed that they did not personally witness Plaintiff kick or assault Defendant Tyson in any way.
59. These sworn testimonies also directly contradict the detailed narrative contained in their initial reports, which identically claimed Plaintiff kicked Defendant Tyson with his right foot in the groin.
60. Their courtroom admissions exposed the original foundational charge as uncorroborated and meritless.
61. Defendant A.P.A. Londy, upon review of evidence that the allegations were made in jest, openly objected to the introduction of the body cam which she herself submitted for use to prosecute Plaintiff.
62. When Plaintiff attempted to replay the recording during cross-examination while Defendant Tyson was under oath, Defendant Simpson abruptly ordered his clerk to terminate the video presentation, effectively obstructing Plaintiff's ability to confront the witness with key exculpatory evidence in real time.
63. Courts have consistently held that the suppression or obstruction of exculpatory evidence, whether by omission or direct interference, undermines the fairness of judicial proceedings and violates the defendant's rights. See *United States v. Agurs*, 427 U.S. 97 (1976); *Kyles v. Whitley*, 514 U.S. 419 (1995).
64. After this suppression, and without any prosecutorial motion, new evidence, or supporting affidavit, Defendant Simpson added two MCL 750.81(d) felony charges *sua sponte* at the closing of the hearing.

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65. Defendant Simpson's expansion of charges, absent executive branch action, violates the doctrine of separation of powers and Plaintiff's procedural and substantive due process rights under the Fifth and Fourteenth Amendments. See *Wayte v. United States*, 470 U.S. 598 (1985).
66. Judges do not possess charging authority, and doing so exceeds their jurisdiction.
67. Defendant Simpson bound the case over to the 22nd Circuit Court under Defendant Slay with no factual findings or legal basis to proceed.
68. After the February 11, 2025 evidentiary hearing, Plaintiff now faces **three** felony MCL 750.81(d) charges without any first-hand eyewitness corroboration, physical evidence, or lawful charging process.
69. The continued pendency of these meritless and compounding charges underscores the retaliatory and unconstitutional nature of the prosecution. More than six months into this malicious and unreasonable prosecution, the case has been marred by repeated adjournments, coordinated suppression of favorable evidence, and judicial actions taken without jurisdiction. This pattern reflects a sustained abuse of discretion, prosecutorial misconduct, and a breakdown of core constitutional protections at every level.

C. Lawful Presentments, Exhaustion of Remedies,
and Institutional Failure to Respond

70. Plaintiff undertook formal and lawful action to challenge the basis of the charges levied against him from the very onset of the case, filing suppression motions based on clear constitutional violations by the officers involved. In doing so, Plaintiff anticipated the direct harm these violations would cause to his personal, familial, and professional life, which would only escalate as the case progressed.
71. In response, Plaintiff was met with continuous judicial misconduct by Defendant Simpson, who deliberately ignored discovery and suppression motions, disregarding Plaintiff's filings and rights.

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72. Defendant Simpson further exacerbated the situation by issuing bench warrants for Plaintiff's failure to appear, despite Plaintiff's timely submission of filings and requests for discovery.
73. In response to the charges levied against him, Plaintiff formally challenged their basis by issuing a Notice of Liability and Demand for Abatement to the Ypsilanti Police Department and Washtenaw County Prosecutors Office.
74. This presentment, executed under penalty of perjury, invoked both the U.S. and Michigan Constitutions and was directed to the Washtenaw County Prosecutor's Office and the Ypsilanti Police Department.
75. In it, Plaintiff declared his political status, identified repeated civil rights violations, and imposed lawful consequences for any further trespass upon his liberties.
76. This notice included clear constitutional claims and penalties for continued unlawful conduct, and requested abatement of further action absent a verified and lawful basis.
77. In addition to these administrative notices, Plaintiff pursued formal judicial remedies in the Michigan appellate courts.
78. On December 9, 2024, Plaintiff filed a Petition for a Writ of Mandamus with the Michigan Court of Appeals, demanding that the lower court be compelled to perform its constitutional duties, including honoring Plaintiff's right to due process and judicial review.
79. On December 11, 2024, Plaintiff filed a Petition for a Writ of Superintending Control, seeking supervisory intervention to correct the pattern of judicial nonfeasance and obstruction at the district court level.
80. These petitions were part of a broader effort to exhaust all lawful avenues for redress.
81. Following the evidentiary hearing, Plaintiff issued a series of sworn affidavits and rebuttal letters intended to lawfully refute the factual and legal foundation of the criminal allegations. These included:

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- A *Formal Rebuttal to Charges* addressed specifically to Defendant Tyson, Officer Smith, and Sgt Gibbs, clearly identifying legal contradictions in their reports, and citing relevant case law including *People v. Moreno* and *People v. Feeley*, to show the charges lacked merit.
- A *Sworn Affidavit of Truth*, which recited in detail the factual timeline of events, acts of excessive force, fabricated evidence, and procedural misconduct by judicial officers and law enforcement. It demanded relief, including dismissal of charges, internal investigation, suppression of tainted evidence, and compensation for harm suffered.

82. Though these lawful notices, filings, and formal rebuttals, were delivered with no response or rebuttal was ever issued by the prosecution, the police department, or the judiciary. Under binding legal maxims—an un rebutted affidavit stands as truth in commerce and law—this silence amounts to tacit acquiescence and a presumed admission to the facts as stated.

83. In furtherance of this good-faith effort to invoke due process, Plaintiff sent multiple documents by certified mail to law enforcement and prosecutorial offices. The following tracking numbers confirm receipt:

- Certified Mail No. 9589 0710 5270 2353 7338 92
Sent to Ypsilanti Police Department – March 7, 2025
- Certified Mail No. 9589 0710 5270 2384 7575 08
Sent to Ypsilanti Police Department – March 12, 2025
- Certified Mail No. 9589 0710 5270 0871 8043 46
Sent to Ypsilanti Police Department – March 26, 2025
- Certified Mail No. 9589 0710 5270 0871 8043 39
Sent to Michigan A.G. Office – March 29, 2025

84. Upon bind over to Circuit Court, On April 1, 2025, Plaintiff filed an Affidavit in Demand for a True Bill, requesting presentment within a 72-hour timeframe.

85. To date, there has been no acknowledgment or response regarding the availability of the request, further confirming the County's failure to meet its burden of proof and provide procedural fairness.

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86. Furthermore, Plaintiff submitted an Affidavit of Truth on April 2, 2025 and again on April 10, 2025, which, though being properly filed and served, these filings have been *intentionally* excluded from the court's record.
87. This conduct constitutes more than mere negligence; it demonstrates the intentional suppression of exculpatory materials as part of a coordinated pattern of procedural manipulation and judicial non-responsiveness, amounting to fraud upon the court and a denial of Plaintiff's rights to fairness, due process, and equitable relief.
88. At the April 3, 2025 pre-trial conference, Defendant Slay initially approved Plaintiff's request to appear via Zoom. However, without addressing or acknowledging Plaintiff's legal and factual assertions, she abruptly terminated the video call and, without cause or discussion, unilaterally expedited an adjourned hearing, setting it for April 10, 2025, while demanding Plaintiff's physical appearance in person.
89. Even with proper rebuttals and unaddressed affidavits on the record, and while denying Plaintiff's request for zoom access, Defendant Slay proceeded to issue a bench warrant for "Failure To Appear".
90. The failure to respond, rebut, or even acknowledge these actions amounts to judicial bad faith, constructive fraud, and a wholesale deprivation of procedural fairness compounded by retaliatory bench warrants.

D. Collateral Impact On Parental Rights and Judicial Abuse in Family Court

91. Although Defendant Conlin did not preside over Plaintiff's criminal case directly, he serves as Chief Judge in Washtenaw County, which includes both the Criminal and Family Divisions.
92. Defendant Conlins position and influence allowed him to improperly use the criminal proceedings against Plaintiff in the context of the family court matters.

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93. On November 20, 2024, Defendant Conlin unlawfully suspended Plaintiff's parenting time, citing the pending criminal charges, without affording Plaintiff prior notice or an opportunity to be heard.
94. The McCloskeys (Alyssa and Scott), in coordination with Defendant Conlin, have repeatedly weaponized emergency services and manipulated law enforcement and the court system to advance personal vendettas against Plaintiff, resulting in sustained violations of his constitutional rights.
95. On October 24, 2024, the McCloskeys maliciously reported Plaintiff's location to law enforcement just before his scheduled custody exchange, knowing the police would arrest him due to a bench warrant. Their intent was not public safety, but to disrupt Plaintiff's custodial time, cause his arrest, and interfere with his parent-child relationship.
96. The McCloskeys orchestrated multiple 911 calls that day, resulting in Plaintiff's wrongful arrest and subsequent medical discharge from the Washtenaw County Jail due to hypertension and emotional distress caused by their actions. These calls were a deliberate attempt to interfere with Plaintiff's parental rights.
97. Despite Plaintiff's medical discharge and efforts to complete the parenting exchange at the child's school, the McCloskeys again contacted law enforcement later that day to interfere with Plaintiff's scheduled parenting time. This was the second time they abused the legal process to deprive Plaintiff of time with his child that day.
98. These manipulative actions reflect an ongoing pattern of retaliatory conduct aimed at depriving Plaintiff of his parental rights. The McCloskeys used their false claims to harass and stalk Plaintiff, all the while attempting to alienate him from his child.
99. On November 19, 2024, Defendant Alyssa McCloskey submitted an affidavit requesting an emergency ex parte order to suspend Plaintiff's parenting time, referencing the arrest she and her husband had orchestrated. This ex parte request violated Plaintiff's rights to due process, relied on fabricated claims, and further perpetuated a pattern of fraudulent actions.

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100. Defendant Conlin granted this ex parte order on November 20, 2024, without an evidentiary hearing or an opportunity for Plaintiff to respond, violating Plaintiff's constitutional rights to procedural due process and his fundamental parental rights.
101. Following the unlawful suspension of Plaintiff's parenting time, Defendant Alyssa McCloskey, through her counsel Veronica White, escalated her retaliatory campaign by filing an Affidavit/Order to SHOW CAUSE why Plaintiff shouldn't be held in contempt on December 17, 2024. In that filing, Defendant McCloskey requested both civil and criminal contempt charges against Plaintiff. This petition was filed less than a month after the November 19, 2024 ex parte suspension of Plaintiff's rights, compounding the procedural abuse already inflicted upon him.
102. Defendant McCloskey's decision to pursue contempt proceedings—rather than addressing the underlying judicial misconduct or false arrest issues—reflected a continued pattern of weaponizing the courts to achieve personal and retaliatory goals. The contempt proceedings were prioritized over Plaintiff's properly filed Motion to Dissolve Ex Parte, Motion for Recusal, and Writ of Quo Warranto while Defendants effectively sidestepping legitimate challenges to judicial bias and further stacking the proceedings against Plaintiff.
103. On January 15, 2025, Defendant Slay dismissed Plaintiff's Recusal Motion without proper consideration and immediately pivoted toward aggressively pursuing the contempt charges against Plaintiff. These actions occurred despite Plaintiff's pending appeal in the Michigan Court of Appeals (Case No. 373843), filed on December 23, 2024, challenging the underlying unlawful deprivation of his rights.
104. The relentless efforts by Defendants to incarcerate Plaintiff through civil and criminal contempt proceedings, while ignoring credible allegations of misconduct, exemplify a grotesque abuse of judicial authority and personal vendettas disguised as legal process. The conduct of the Defendants illustrates a

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deliberate, coordinated campaign to silence Plaintiff's lawful attempts to vindicate his rights and to punish him for seeking redress through legitimate legal channels.

105. Defendant Slay, now presiding over both Plaintiff's baseless criminal case and the parallel custody matter, has abused her dual authority to suppress accountability for the misconduct perpetrated within Washtenaw County courts. By controlling both proceedings simultaneously, Defendant Slay has used the pending criminal charges—despite their lack of evidentiary support—as justification to prolong and effectively ban Plaintiff's access to his child, without any proof of actual harm, danger, or wrongdoing by Plaintiff.
106. While delaying any genuine reunification efforts between Plaintiff and his child in the family court proceedings, Defendant Slay has simultaneously expedited Plaintiff's criminal matter without proper legal foundation. These actions are calculated to shield the court system from scrutiny and avoid addressing the constitutional violations Plaintiff has raised. Defendant Slay's conduct constitutes a gross abuse of judicial discretion, revealing a systemic pattern of bad faith, retaliatory litigation tactics, and obstruction of justice at the judicial level.
107. During the December 12, 2024 hearing, Defendant Conlin ignored the well-documented abuse of process by the McCloskeys, relying on fabricated police reports and unadjudicated criminal charges to continue the suspension of Plaintiff's parental rights. This decision undermined Plaintiff's right to a fair hearing and denied him due process.
108. On January 24, 2025, Defendant Slay, after reassignment of the case, upheld Defendant Conlin's prior orders without a de novo review, further denying Plaintiff his constitutional rights. The court also imposed severe restrictions on Plaintiff's access to his child, including appointing Scott McCloskey—the very individual who had orchestrated the false reports against Plaintiff—as the supervisor for Plaintiff's limited, one-hour video calls with his child.

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109. This decision by Defendant Slay was retaliatory in nature, as it allowed the McCloskeys, who had abused emergency services and the legal process to harm Plaintiff, to continue exerting control over Plaintiff's interactions with his child. The appointment of Scott McCloskey as the supervisor of these video calls undermines any meaningful connection between Plaintiff and his child, and reflects a disregard for Plaintiff's parental rights.
110. The court-imposed conditions for these video calls, including restrictions on the topics Plaintiff could discuss with his child, further demonstrated the punitive and retaliatory nature of the proceedings. These interruptions, which included abrupt terminations of calls and dismissive treatment, are part of the broader pattern of abuse Plaintiff has experienced.
111. The actions of Defendant Conlin, Defendant Slay, and the McCloskeys reflect a coordinated effort to strip Plaintiff of his parental rights and to retaliate against him for challenging their actions. These sustained violations have caused irreversible harm to Plaintiff's relationship with his child, and reflect systemic abuse of judicial and law enforcement power.
112. The actions of Defendants—who manipulated the legal process and abused their power—represent not only retaliation but a clear violation of Plaintiff's constitutional rights. Plaintiff seeks immediate redress for these ongoing violations and a remedy for the broader systemic harm caused by the abuse of judicial power and the manipulation of law enforcement and emergency services by private parties like the McCloskeys.
113. Under *Monell v. Dep't of Social Servs.*, 436 U.S. 658 (1978), Washtenaw County is liable for constitutional violations resulting from its policies, practices, or customs, including its failure to safeguard due process rights and prevent judicial overreach. The County's inability to protect Plaintiff from these abuses reflects a broader institutional failure.

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CLAIMS FOR RELIEF

Claim I – 42 U.S.C. § 1983 – False Arrest / Unlawful Seizure (Fourth Amendment)

114. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth herein.
115. Defendant Tyson, Officer Smith, and Sgt Gibbs, acting under color of law, arrested and detained Plaintiff on October 11, 2024, without a warrant, probable cause, or exigent circumstances, thereby violating Plaintiff's rights under the Fourth and Fourteenth Amendments.
116. The arrest was not based on individualized suspicion or any objectively reasonable justification. The officers' own statements and the sequence of events confirm that the charge was fabricated post hoc.
117. Plaintiff suffered a deprivation of liberty, emotional distress, reputational harm, and financial loss as a direct result of the unlawful seizure.

Claim II – 42 U.S.C. § 1983

Malicious Prosecution / Fabrication of Evidence

118. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth herein.
119. Defendants, acting individually and in concert, caused criminal charges to be initiated against Plaintiff without probable cause by fabricating evidence and submitting false police reports.
120. Officers Tyson, Smith, and Gibbs knowingly submitted coordinated and materially false incident reports contradicting their spontaneous on-scene statements.
121. These actions initiated and prolonged a baseless prosecution in violation of Plaintiff's due process rights.

Claim III – 42 U.S.C. § 1983

Suppression of Exculpatory Evidence (Brady Violation)

122. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth herein.
123. Defendants, including Officer Tyson, A.P.A. Londy, and Simpson willfully suppressed/obstructed access to body camera footage and other exculpatory materials that undermined the prosecution's allegations.
124. This suppression violated Plaintiff's rights under *Brady v. Maryland*, 373 U.S. 83 (1963), and deprived him of a fair judicial process.

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Claim IV – 42 U.S.C. § 1983

Judicial Misconduct and Procedural Due Process Violations

- 125. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth herein.
- 126. Judge Simpson, acting under color of state law, unlawfully expanded criminal charges against Plaintiff without any motion from the prosecution or new factual predicate.
- 127. These actions exceeded judicial authority and violated the Fifth and Fourteenth Amendments' guarantees of due process and separation of powers.

Claim V – First Amendment Retaliation

- 128. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth herein.
- 129. Plaintiff engaged in protected speech and petitioned the courts and executive agencies for redress. In response, he was retaliated against by prosecutors, officers, and judges, including the addition of unsupported charges and suppression of filings and affidavits.

Claim VI – Abuse of Process / Retaliatory Child Custody Interference

(Fourteenth Amendment Substantive Due Process)

- 130. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth herein.
- 131. Defendants Alyssa and Scott McCloskey deliberately abused state resources, including police and court systems, to interfere with Plaintiff's custodial rights.
- 132. Judge Conlin issued ex parte custody orders without factual basis or procedural safeguards, relying on false reports to indefinitely suspend Plaintiff's parenting time and impose unlawful restrictions on his access to the court.
- 133. These acts violated Plaintiff's substantive due process rights to family integrity, as recognized under *Troxel v. Granville*, 530 U.S. 57 (2000), and the Fourteenth Amendment.

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MOTION FOR SUMMARY JUDGMENT UNDER FED. R. CIV. P. 56(c)

Pursuant to Rule 56(c) of the Federal Rules of Civil Procedure, Plaintiff respectfully moves for summary judgment on Claims I through VI. The evidentiary record, including sworn testimony, documentary evidence, and uncontroverted facts, establishes that there is no genuine dispute as to any material fact, and that Plaintiff is entitled to judgment as a matter of law on each claim.

Statement of Undisputed Material Facts

I. Unlawful Arrest and Fabricated Felony Charges

1. On October 11, 2024, Plaintiff was arrested by Officers Tyson, Gibbs, and Smith without a warrant, probable cause, or any articulable suspicion of criminal conduct.
2. Body-worn camera footage from the officers shows that Officer Tyson initially claimed that Plaintiff “kicked me — he tried to kick me in the nuts,” but minutes later recanted, stating, “No, I’m just joking.”
3. There is no physical evidence or corroborative witness testimony to support the alleged assault.
4. At the February 11, 2025 evidentiary hearing, Officers Gibbs and Smith testified under oath that they did not witness any assault by Plaintiff on Officer Tyson.
5. Officer Tyson could not identify the instant in the body-worn footage that would corroborate the alleged assault.
6. Incident reports submitted by the officers were materially identical in structure and language, suggesting coordination and fabrication of charges post hoc.
7. No lawful basis for the criminal charges was established, and the charges were based solely on inconsistent and jest statements post hoc.

II. McCloskeys’ Ex Parte Affidavit and Judge Conlin’s Order

8. On October 11, 2024, Plaintiff was unlawfully arrested without probable cause.
9. On October 24, 2024, Defendants Alyssa and Scott McCloskey knowingly and maliciously misused the 911 emergency system by placing three separate 911 calls regarding Plaintiff.
10. During a hearing on January 24, 2025, the McCloskey’s admitted under oath that they initiated these calls not because Plaintiff engaged in any unlawful conduct, but because they were aware Plaintiff had an active warrant and sought to cause his arrest.

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11. As a direct result of the McCloskey's misuse of emergency services, Plaintiff was arrested again on October 24, 2024. This second arrest within a week was artificially manufactured through the Defendants' manipulation of law enforcement resources.
12. The McCloskey's subsequently relied on the circumstances they themselves had orchestrated — specifically, Plaintiff's October 24, 2024 temporary detention — to support their ex parte emergency motion filed on November 19, 2024, in Washtenaw County Family Court.
13. In their emergency affidavit, the McCloskeys falsely portrayed Plaintiff as a danger to the welfare of his child, claiming a "potential" risk of the child being left unattended at a bus stop, and explicitly requested that Plaintiff's parenting time be suspended pending the resolution of unadjudicated criminal charges.
14. The McCloskeys' conduct in misusing 911 services to engineer Plaintiff's arrest, then using the manufactured arrests to obtain an ex parte suspension of parental rights, was premeditated, malicious, and undertaken to serve their private interests rather than any legitimate public concern.
15. Such conduct constituted an abuse of legal process and a deliberate deprivation of Plaintiff's constitutional rights under color of state law.
16. On November 20, 2024, Judge Conlin issued the ex parte order, suspending Plaintiff's parenting time without notice, hearing, or evidentiary review, based on the unresolved criminal charges.
17. Conlin issued the order without any factual investigation and even done so prior to Londy submitting discovery to Plaintiff and without access to any exculpatory materials from the criminal case.
18. On December 12, 2024, Judge Conlin upheld his initial suspension order, reading the felony charge in full into the family court record over Plaintiffs continuous objections or giving Plaintiff a meaningful opportunity to be heard.
19. As a direct result of The McCloskey's and Conlin actions by and through this ex parte order, Plaintiff has been indefinitely denied access to his child and has not seen his child since November 11, 2024.

III. Judicial Misconduct by Defendant Simpson and Prosecutorial Misconduct by Londy

20. Prosecutor Londy and Assistant Prosecutor Savit failed to disclose critical exculpatory evidence, even objecting to the review of their own material in open court, including body-worn camera footage, violating *Brady v. Maryland*, 373 U.S. 83 (1963) actively in real time.
21. On February 11, 2025, during a hearing in the criminal matter, Judge Simpson abruptly instructed his clerk to terminate the courtroom review of the prosecution's body-worn camera footage.

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22. Immediately thereafter, and without any motion or evidentiary basis from the prosecution, Judge Simpson sua sponte expanded the charges against Plaintiff from one felony count to three. This unilateral action violated Plaintiff's due process rights under the Fifth and Fourteenth Amendments.
23. The failure to disclose this evidence prevented Plaintiff from presenting a full defense in both the criminal and family court proceedings, and allowed the McCloskeys' unfounded motion to be granted by Conlin.

IV. Retaliation, Abuse of Process, and the Suspension of Parental Rights

24. Defendants Alyssa and Scott McCloskey engaged in a sustained, multi-year campaign to interfere with Plaintiff's custodial rights, fabricating and falsifying their own narrative. Their efforts culminated in success when they submitted their *second* attempt at an ex parte motion on November 19, 2024, leveraging unresolved and meritless criminal accusations to secure the suspension of Plaintiff's parenting time.
25. Judge Conlin's suspension order was an extension of this abuse of process, as it was issued without proper procedural safeguards, and based solely on unsupported and fabricated allegations.
26. As of today's date, Plaintiff has seen his child for over five months as a direct and ongoing consequence of the coordinated and unlawful actions of all named Defendants, whose abuse of state power, authority, and procedural violations collectively deprived Plaintiff of his fundamental rights to family integrity.

V. Ongoing Harm and Deprivation of Rights

27. Plaintiff has suffered irreparable harm, including but not limited to emotional distress, severe damage to his relationship with his child, financial losses, and the continued deprivation of his parental rights.

Legal Standard Under Rule 56(c)

Summary judgment is appropriate when "there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." A genuine issue exists only if the evidence is such that a reasonable jury could return a verdict for the non-moving party. Where no such issue exists, and the facts are supported by the record, judgment is proper.

Argument

The record establishes conclusively that:

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- Plaintiff was arrested without probable cause (Claim I);
- Evidence was fabricated to justify prosecution (Claim II);
- Exculpatory evidence was suppressed (Claim III);
- Charges were unlawfully expanded by a judge without motion or legal predicate (Claim IV);
- Plaintiff's protected First Amendment activity was met with state retaliation (Claim V); and
- Defendants abused legal process to interfere with Plaintiff's custodial rights, violating substantive due process (Claim VI).

Each claim is supported by uncontroverted testimony, video evidence, and official records. There are no genuine disputes of material fact precluding judgment. **The evidence is clear, direct, and corroborated**—including admissions under oath, documented violations of constitutional rights, and systemic misconduct.

Accordingly, Plaintiff respectfully submits that the Court's intervention to award full custody is necessary not merely to vindicate Plaintiff's constitutional parental rights, but also to safeguard the minor child against continued emotional harm, manipulation, and instability resulting from Defendants' unlawful and malicious conduct as documented by this harassment campaign.

Conclusion and Relief

For the foregoing reasons, Plaintiff respectfully requests that the Court grant summary judgment in his favor on all six claims (Claims I–VI) and enter judgment as a matter of law.

Accordingly, Plaintiff respectfully requests the following relief:

1. Declaratory Relief

- A. A declaration that Defendants' actions, jointly and severally, violated Plaintiff's constitutional rights under the First, Fourth, and Fourteenth Amendments.
- B. A declaration that the ex parte suspension of Plaintiff's parenting time and restrictions on his court access were unlawful and imposed without due process.

2. Preliminary and Permanent Injunctive Relief

- A. An immediate Preliminary Injunction and Temporary Restraining Order enjoining Defendants from:
 - a. Interfering with Plaintiff's custodial and visitation rights.
 - b. Enforcing any unlawful restrictions on Plaintiff's court filings or communication with his child.
- B. An order restoring Plaintiff's full parenting time, including the immediate reinstatement of his custodial rights ex parte where necessary to prevent irreparable harm to the parent-child relationship.
- C. An order granting Plaintiff full legal and physical custody of his minor child, as Defendants' actions—including the misuse of emergency services, malicious prosecution,

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and parental alienation—have consistently undermined the child's best interests through ongoing bad-faith misconduct. This includes the continued, vindictive termination of Plaintiff's one-hour/week video calls, which has been repeatedly done with the intent to cause harm and further disrupt the parent-child relationship.

3. Dismissal of Pending Charges

- A. An order dismissing with prejudice all pending criminal charges and proceedings that were unlawfully initiated through fraudulent reports, retaliatory motives, and procedural misconduct.

4. Independent Investigation

- A. A formal request for the appointment of a Special Master under Fed. R. Civ. P. 53 to examine:
- a. Judicial and prosecutorial misconduct alleged herein.
 - b. False reporting and abuse of emergency services by private parties acting in concert with state actors.
 - c. Systemic due process violations within the Washtenaw County Trial Court's Family and Criminal Divisions.

5. Monetary Damages

- A. Compensatory damages for emotional distress, reputational harm, legal expenses, lost parenting time, and violations of Plaintiff's constitutional rights.
- B. Punitive damages against all individual Defendants who acted with malice or reckless disregard for Plaintiff's rights.
- C. Attorneys' fees and costs pursuant to 42 U.S.C. § 1988.

6. Sanctions and Accountability

- A. Appropriate civil contempt sanctions or disciplinary referrals for judicial or prosecutorial actors who willfully violated their ethical or constitutional duties.
- B. Referral of Alyssa and Scott McCloskey for criminal investigation under state and federal law for knowingly making false reports to law enforcement and CPS with the intent to deprive Plaintiff of his civil rights.

7. Other Relief

Any other relief the Court deems just and proper to redress the injuries suffered by Plaintiff and prevent further violations.

VI. JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

Issued and affirmed without prejudice and with full reservation of all rights.

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Issued and affirmed without prejudice and with full reservation of all rights.

Respectfully submitted,

Dated: April 25, 2025

By: Beneficiary, *Daniel McGough*

Daniel McGough
danielryanmcgough, beneficiary
for DANIEL RYAN MCGOUGH
Without Prejudice, Without Recourse
P.O. BOX 970081
Ypsilanti, Michigan 48197

Witnesses

Brooklyn Ostrander

Witness 1 Signature

Brooklyn Ostrander

Witness 1 Printed

Date: April 25, 2025

Kayli Sloan

Witness 2 Signature

Kayli Sloan

Witness 2 Printed

Date: April 25, 2025

Notarial Acknowledgement

Jackson County of Michigan State

I, *Kayla Renfer*, a Public Notary, was visited today, this twenty-fifth day of April in the year two thousand twenty-five by the man known to me to be Daniel Ryan McGough and said man did affirm and sign this Notice and Presentment of Fraud, Trespass, Breach of Fiduciary Obligation and Commercial Default in my presence for the purposes stated. And on this same day, said above two witnesses, confirmed their identity to me, then affirmed and signed the same, respectively.



By: *Kayla Renfer*

KAYLA RENFER
NOTARY PUBLIC, Jackson County, MI
My Commission Expires May 19, 2027

Notary Public

Date: 4/25/2025

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McGough v. Washtenaw County, et al. | U.S. District Court - Eastern District of Michigan**Table of Contents — Exhibits in Support of Complaint**

Exhibit	Pages	Description
Exhibit 1	30–33	Ypsilanti Police Report (Oct. 11, 2024)
Exhibit 2	34–36	Exonerating excerpts from Defendant Tyson’s bodycam transcript.
Exhibit 3	37	Felony Complaint – Absent a Complainant
Exhibit 4	38	Register of Actions
Exhibit 4	39	Washtenaw County Sheriff Report: Defendants First 911 dispatch to Plaintiff’s Mother’s Home (Oct. 25, 2024).
Exhibit 5	40–41	Washtenaw County Sheriff Report: Third 911 dispatch to Plaintiff’s mother’s home (Oct. 25, 2024).
Exhibit 6	42	Text messages from Defendant Alyssa McCloskey admitting misuse of 911 and demonstrating legal and moral incompetence. (Oct 25, 2024)
Exhibit 7	43	Michigan State Police Report: Child’s disclosure of abuse by mother prior to retaliatory ex parte filing (November 8, 2024).
Exhibit 8	44	Frivolous Ex Parte Request Based on Defendants Own Manufactured Law Enforcement Activity (Nov. 19, 2024)
Exhibit 9	45	Ex Parte Suspension Order Entered Without Due Process (Nov. 20, 2024)
Exhibit 10	46	Defendant’s Repeated Attempts to Obtain Ex Parte Relief Despite Lack of Legal Merit (May 26, 2023)
Exhibit 11	47-48	Defendant Conlin’s imposition of procedural barriers and obstruction of Plaintiff’s access to justice. (December 12, 2024)
Exhibit 12	49	Defendant Alyssa McCloskey’s Petition for Contempt Against Plaintiff Requesting Civil and Criminal Charges (Dec 17, 2024)
Exhibit 13	50- 51	Collateral Economic Harm: Plaintiff’s Loss of Employment Opportunities Due to Retaliatory Criminal Charges
Exhibit 14	52-53	Friend of the Court’s Indifference to Continued Custodial Interference (March 17, 2025 & March 19, 2025).
Exhibit 15	54	First in Series of False CPS Reports Filed by the McCloskeys Against Plaintiff (June 26, 2021)
Exhibit 16	55	Veteran’s Statement on Oaths of Office, Lawful Authority, and Constitutional Accountability
Exhibit 17	56-60	Oaths of Office for Defendants Conlin, Slay, Simpson, Savit, and Londy

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10/11/2024 YPD Police Report

CR No: 240013842



YPSILANTI PD

505 W MICHIGAN AVE
YPSILANTI MI 48197
734-483-9510



Case Report

Administrative Details:

CR No	Subject
240013842	SUPPLEMENT REPORT
Report Date/Time	Occurrence Date/Time
10/11/2024 02:46	10/11/2024 02:46
Location	Call Source
113 W MICHIGAN AVE	911
Dispatched Offense	Verified Offense
5393 Disorderly Conduct (Other)	1313 Assault/ Battery/Simple (Incl Domestic and Police Officer)
County	City/Twp/Village
81 - Washtenaw	80 - Ypsilanti
Division	
Patrol	

Action Requested:

<input type="checkbox"/> Arrest warrant	<input type="checkbox"/> Review only
<input type="checkbox"/> Search warrant	<input type="checkbox"/> Forfeiture
<input type="checkbox"/> Juvenile petition	<input type="checkbox"/> Other

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10/11/2024 YPD Police Report

CR No: 240013842

Redaction ID: 408808

**Offenses:****1313 - Assault/ Battery/Simple (Incl Domestic and Police Officer [YCSMITHL (402)])**

IBR Code / IBR Group	Offense File Class	
13B - Simple Assault / A	13001 - NONAGGRAVATED ASSAULT	
Crime Against	Location Type	Offense Completed
PE	18 - Parking Lot/Garage	Completed
Domestic Violence	Hate/Bias	
No	00 - None (No Bias)	
Using		
A-Alcohol: No C-Computer Equipment: No D-Drugs/Narcotics: No		
Weapons		
40 - Personal Weapons (Hands, Feet, Teeth, etc.)		
Criminal Activity		
N - None/Unknown		

4801 - Resisting Officer [YCSMITHL (402)]

IBR Code / IBR Group	Offense File Class	
90Z - All Other Offenses / B	48000 - OBSTRUCTING POLICE	
Crime Against	Location Type	Offense Completed
	18 - Parking Lot/Garage	Completed
Domestic Violence	Hate/Bias	
No	00 - None (No Bias)	
Using		
A-Alcohol: No C-Computer Equipment: No D-Drugs/Narcotics: No		

4802 - Obstruct Criminal Investigation [YCSMITHL (402)]

IBR Code / IBR Group	Offense File Class	
90Z - All Other Offenses / B	48000 - OBSTRUCTING POLICE	
Crime Against	Location Type	Offense Completed
	18 - Parking Lot/Garage	Completed
Domestic Violence	Hate/Bias	
No	00 - None (No Bias)	
Using		
A-Alcohol: No C-Computer Equipment: No D-Drugs/Narcotics: No		

Narrative:**CR No: 240013842-001 Written By: YCTYSOND (00395) Date: 10/11/2024 04:47 AM****SUPPLEMENT REPORT:**

R/O Assault on officer

LOCATION:

Puffer Red's

113 W. Michigan Ave.

Ypsilanti, MI 48197

INFORMATION:

While searching a Daniel McGough who was under arrest for interfering with police investigation. I had Daniel at the back door of Sgt. Gibbs patrol vehicle Daniel made statements about dashing

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10/11/2024 YPD Police Report

CR No: 240013842

Redaction ID: 400000



referring to running. I told Daniel to relax as I held him against the vehicle. At which time Daniel kicked back with his right leg striking me in the groin. I then placed Daniel in the back of Sgt. Gibbs' patrol vehicle.

STATUS:

Open.

SUBMITTED:

Tyson#395

CR No: 240013842-002 Written By: YCSMITHL (402) Date: 10/11/2024 08:50 AM

NATURE OF INCIDENT:

Resisting and Obstructing, Obstructing an Investigation, and Assault on a Peace Officer

DATE/TIME:

10/11/2024 0246HRS

LOCATION:113 W Michigan Ave
Ypsilanti, MI 48197**ARRESTEE:**

Daniel McGough

INFORMATION:

I was dispatched to 113 W Michigan Ave reference a fight in progress. Dispatch advised a white male with a large gray sweatshirt and a black male is in the parking lot behind puffer red fighting. Upon arrival, I started canvassing the area and observed a white male surrounded with alcoholic cans laid against a vehicle and the following occurred.

CONTACT WITH DANIEL MCGOUGH:

While I was investigating, Daniel McGough began to approach Sgt. Gibbs and began to consistently question Sgt. Gibbs in a disorderly manner. Sgt. Gibbs gave multiple verbal warning to Daniel to leave from the location to deescalate the situation. Daniel continuously obstructed the investigation after multiple warnings from Sgt. Gibbs and officers on scene. While placing Daniel into handcuffs, he consistently resisted officers by placing both of his forearms and hands together against the patrol vehicle as officers tried to place him in custody. Daniel was escorted

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10/11/2024 YPD Police Report

CR No: 240013042

Production ID: 400000



to Sgt. Gibbs patrol vehicle to be searched. As I was conducting the search, Daniel assaulted Ofc. Tyson by kicking him in the groin with his right foot after multiple warnings from Ofc. Tyson and officers on scene. The search was completed, and Daniel was placed into the patrol vehicle.

ARREST:

I transferred custody to Ofc. Cheese and Daniel was transported to Washtenaw County Jail for booking and processing.

STATUS:

Open

SUBMITTED BY:

Smith #402

CFS Narrative By: YCSMITHL (402)

I was dispatched to 113 W Michigan Ave reference a fight in progress. Dispatch advised a white male with a large gray sweatshirt and a black male is in the parking lot behind puffer red fighting. Upon arrival, I started canvassing the area and observed a white male surrounded with alcoholic cans laid against a vehicle. While I was investigating, Daniel McGough continuously obstructed the investigation after multiple warnings from Sgt. Gibbs and officers on scene. While placing Daniel into handcuffs, he consistently fought officers and was escorted to my patrol vehicle be searched. As I was conducting the search, Daniel assaulted Ofc. Tyson by kicking him in the groin with his right foot after multiple warnings from Ofc. Tyson and officers on scene. Daniel was transported to Washtenaw County Jail for booking and processing.

SEE REPORT

Smith #402

CFS Narrative By: YCTYSOND (00395)

I was dispatched to 113 W. Michigan Ave. reference a fight. Dispatch advised two subjects were in the back parking lot of Puffer Red's. Upon arrival officers canvassed the area for the subjects with negative results.

INCIDENT ONLY:

Tyson#395

10/11/2024 Arrest Transcript Excerpts

STATE OF MICHIGAN

IN THE 14A-1 DISTRICT COURT (WASHTENAW COUNTY)

THE PEOPLE OF THE STATE OF MICHIGAN,

v.

Case No. 24-13842
Hon. Cedric J. Simpson

DANIEL MCGOUGH,

Defendant.

./

TRANSCRIPTION OF VIDEO TITLED:

24-242 YPD FOIA BODY CAM 1.MP4

Friday, October 11, 2024 - Timestamp of 2:50:50

TRANSCRIPTION PROVIDED BY:

KRISTEN SHANKLETON (CER 6785)

Modern Court Reporting & Video, L.L.C.

SCAO Firm No. 08228

101-A North Lewis Street

Saline, Michigan 48176

moderncourtreporting@hotmail.com

(734) 429-9143/krs

Note:

**For full copies of transcripts, reports, or related materials, email dryan616@icloud.com.
State or federal agents may contact the Washtenaw County Prosecutor's Office, which has had possession of the
original audio and video recordings since entering the indictment into the State system on October 11, 2024.
Transparency is encouraged.**

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]

313-348-0459 | dryan616@icloud.com

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10/11/2024 Arrest Transcripts Excerpts

1 DISPATCH: Clear.

2 SERGEANT GIBBS: -- what we're going to do, we

3 charge him, one, interfering. Several times talked to him,

4 he's out, whatever, refused to move, interfering. And then

5 get him over there. Did he --

6 OFFICER TYSON: Man he kicked me -- he tried to

7 kick me in the nuts, bruh.

8 SERGEANT GIBBS: He -- he kicked you?

9 OFFICER TYSON: Hell, yeah. Why you think I got

10 what -- did what I -- I wasn't trying to do it. He kicked

11 me.

12 SERGEANT GIBBS: Oh, I didn't know he kicked. So

13 that's R&O right there. So we can take him straight to

14 jail at this point. Yep.

15 OFFICER TYSON: Okay.

16 JACOB: For real?

17 OFFICER TYSON: No, not you, dawg.

18 JACOB: Me?

19 SERGEANT GIBBS: You're good.

20 OFFICER TYSON: You good, brother.

21 JACOB: Well, then why you telling him that?

22 OFFICER TYSON: No.

Notes:

**For full copies of transcripts, reports, or related materials, email dryan616@icloud.com.
State or federal agents may contact the Washenaw County Prosecutor's Office, which has had possession of the
original audio and video recordings since entering the indictment into the State system on October 11, 2024.
Transparency is encouraged.**

10/11/2024 Arrest Transcripts Excerpts

17 HVA STAFF 1: Do you guys know him?
18 OFFICER TYSON: I do not. It's my first time
19 encounter (unintelligible).
20 HVA STAFF 1: Yeah, I've seen (unintelligible)
21 behind Puffer Reds a few times. I wasn't sure if it was a
22 regular guy, but.
23 (At timestamp 3:12:12, audio cuts out)
24 (At timestamp 3:12:22, audio resumes)
25 OFFICER TYSON: I got kicked, too. I'm hurting.

30

1 No, I'm just joking. Ha-ha. You've got to deal with me the
2 rest of the night.
3 HVA STAFF 2: It's been a night. Have you guys
4 had a crazy night, too, or?
5 OFFICER TYSON: Yes.
6 HVA STAFF 2: Yeah.
7 OFFICER TYSON: It's been an entertaining night,
8 nonetheless.

Notes:

**For full copies of transcripts, reports, or related materials, email dryan616@icloud.com.
State or federal agents may contact the Washtenaw County Prosecutor's Office, which has had possession of the
original audio and video recordings since entering the indictment into the State system on October 11, 2024.
Transparency is encouraged.**

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10/11/2024 Complaint Felony – Absent a Complainant

CTN: 2024004825 DC1
wnInformation - Circuit Court
Original Complaint - Court
Warrant - CourtBind over/Transfer - Circuit/Juvenile Court
Complaint copy - Prosecutor
Complaint copy - Defendant/Attorney

STATE OF MICHIGAN 14A2 JUDICIAL DISTRICT 22ND JUDICIAL CIRCUIT	COMPLAINT FELONY	T.C.N. NO.: DISTRICT: CIRCUIT:
District Court ORI: MI- MB10036J 415 West Michigan, Ypsilanti, MI 734-484-6690	Circuit Court ORI: MI- MB10015J 101 E. Huron Street Ann Arbor, MI, 48107	

THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address V DANIEL MCGOUGH AKA: 1173 Hunter Ave YPSILANTI, MI 48198	Victim or complainant
		Complaining Witness COURT OFFICER
Co-defendant(s)		Date: On or about 10/11/2024
City/Twp./Village Ypsilanti City	County in Michigan WASHTENAW	Defendant TCN 81-24004825-01
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Defendant DLN Put DLN in Ref. No. row 3 on MC 97	Defendant SID 2354579J
Police agency report no. YPD 24-13754	Charge See below	Maximum penalty See below
[X] A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.		

STATE OF MICHIGAN, COUNTY OF Washtenaw

The complaining witness says that on the date and at the location described: 113 W MICHIGAN AVE, the defendant, contrary to law,

COUNT 1: POLICE OFFICER - ASSAULTING/RESISTING/OBSTRUCTING

did assault, batter, wound, resist, obstruct, oppose, or endanger DARNELL TYSON, a police officer of YPSILANTI POLICE DEPARTMENT that the defendant knew or had reason to know was performing his or her duties; contrary to MCL 750.81d(1). [750.81D1]

FELONY: 2 Years and/or \$2,000.00. A consecutive sentence may be imposed under MCL 750.506a if the assault was committed in a place of confinement, or under MCL 750.81d(6) for another violation arising from the same transaction

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

ON INFORMATION, BELIEF AND OTHER EVIDENCE

- ☐ The complaining witness asks that the defendant be apprehended and dealt with according to law.

Warrant authorized on 10/11/2024 by:


Prosecuting Official, PATRICIA REISER P52153

- ☐ Security for costs posted

I declare under the penalties of perjury that this complaint has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Complaining Witness Signature

Date

Approved SCAO, PACC-PAAM Replacement
Form MC 200w, Rev. 9/22
MCL 764.1 et seq., MCL 766.1 et seq., MCL 767.1 et seq., MCR 6.101, MCR 6.102

Distribute form to:
Court
Prosecutor
Defendant

OFFICER IN CHARGE: LAWRENCE SMITH YPD 24-13754

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Submitted By: **Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]**313-348-0459 | dryan616@icloud.com

Register of Actions

REGISTER OF ACTIONS

CASE NO. 25-000075-FH

The People of the State of Michigan vs McGough, Daniel Ryan \$ \$ \$ \$ \$ \$ \$ \$ \$	Case Type: Noncapital Felonies (FH) Date Filed: 02/13/2025 Location: Adult Judicial Officer: Slay, Arianne E. Criminal Tracking Number: 812400482501 District Court Case Number: 24F21389 Police Report Number: 24-13842 Tracking Control Number: J624021677W
--	--

PARTY INFORMATION

Defendant McGough, Daniel Ryan SID: MI2354579J	Male White 5' 10", 170 lbs	Attorneys Pro Se
State of People of the State of Michigan Michigan		

CHARGE INFORMATION

Charges: McGough, Daniel Ryan	Statute	Level	Date
1. POLICE OFFICER - ASSAULTING/RESISTING/OBSTRUCTING	75081D1	Felony	10/11/2024
2. POLICE OFFICER - ASSAULTING/RESISTING/OBSTRUCTING	75081D1	Felony	10/11/2024
3. POLICE OFFICER - ASSAULTING/RESISTING/OBSTRUCTING	75081D1	Felony	10/11/2024

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS	
02/11/2025	Bind Over Packet Received
02/11/2025	Protected Personal Identifying Information
02/11/2025	Defendant's Bond <i>PR bond continued</i> Amount: 5,000.00
04/01/2025	Affidavit <i>of Request for Certified Copy of True Bill</i>
04/02/2025	Transcript <i>of Preliminary Examination held 02-11-2025 (107 pages)</i>
04/02/2025	Demand - Waiver for Transcript of Preliminary Examination
04/03/2025	Pre-Trial (1:30 PM) (Judicial Officer Slay, Arianne E.) Result: Held
04/04/2025	Request and Order for Zoom Appearance Granted <i>sgd 4/3/25</i>
04/09/2025	Request and Order for Zoom Appearance Denied <i>(sgd 4/8/2025)</i>
04/10/2025	Pre-Trial (1:30 PM) (Judicial Officer Slay, Arianne E.) <i>Adj 4/3</i> Result: Failed to Appear - Bench Warrant to Issue
04/10/2025	Affidavit <i>of Notice of Non-Appearance, Rebuttal of Charges, and Dismissal</i>

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]

313-348-0459 | dryan616@icloud.com

10-25-2025 Abuse of Police Powers to Undermine Plaintiffs Parenting time

CR No: 240082125
DO NOT WRITE BELOW THIS LINE OR IT WILL BE DELETED

WASHTENAW COUNTY SHERIFF'S OFFICE

2201 HOBBACK RD.
ANN ARBOR MI 48106
734-973-4655

Jerry L. Clayton, Sheriff

Case Report

Administrative Details:

CR No 240082125	Subject
Report Date/Time 10/25/2024 14:54	Occurrence Date/Time 10/25/2024 14:54
Location 1173 HUNTER AVE	Call Source PHONE
Dispatched Offense C3324 Suspicious Circumstances	Verified Offense I3503 Attempt to Serve Warrant - WD
County 61 - Washtenaw	City/Twp/Village 20 - Ypsilanti Twp
Dispatcher PTO	

Action Requested:

<input type="checkbox"/> Arrest warrant	<input type="checkbox"/> Review only
<input type="checkbox"/> Search warrant	<input type="checkbox"/> Forfeiture
<input type="checkbox"/> Juvenile petition	<input type="checkbox"/> Other

People:

MCGOUGH, DANIEL RYAN (O-OTHER) (X-MISCELLANEOUS) [WDSARCEVICHV (02935)]									
PF	W Type	Last Name	First Name	Middle Name	Suffix	Mr/Mrs/Ms			
		MCGOUGH	DANIEL	RYAN					
Aliases	Device License#	DL State	DL Country	Personal ID#					
		MI							
DOB (Age)	Sex	Race	Ethnicity	Birth City & State	Birth Country	Country of Citizenship			
	M	WHITE	Unknown						
Eye Color	Hair Color	Hair Style	Hair Length	Facial Hair					
Blue	Blond or Strawberry								
Complexion	Build	Teeth	Height	Weight	Attire				
Street Address	Apt #	County	Country	Home Phone	Work Phone				
				UNKNOWN					
City	State	Zip	Cell Phone	Email					
YPSILANTI	MI	48198-3187	UNKNOWN						

Narrative:

CFS Narrative By: WDSARCEVICHV (02935)

WDDAILEYD - 14:54:21 - TOW BEAT: WALL WDDAILEYD - 14:54:21 - CLR KNOWS S1, WON'T SAY HOW, SAYS HE HAS A WARRANT & IS CURRENTLY AT THIS LOCATION S1: MCGOUGH/DANIEL// WM [REDACTED] WDSHAWJ - 14:55:55 - S1 MCGOUGH/DANIEL, WM,

Page 1 of 2

Created On 12/02/2024 01:12 PM

CR No: 240082125
DO NOT WRITE BELOW THIS LINE OR IT WILL BE DELETED

ATTEMPTED TO SERVE A WARRANT ON MCGOUGH DANIELS. IT WAS YPD WARRANT. HE ADVISED THAT HE SUBMITTED A REQUEST TO QUASH THE WARRANT/ GET RID OF THE WARRANT. THE JUDGE DID NOT REVIEW IT YET, SO WE TOOK HIM TO THE COUNTY JAIL. MEDICAL PERSONNELL ADVISED THAT HE HAS HIGH BLOOD PRESSURE. TOT HVA

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

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10/25/2025 Continued Misuse of Police Powers to Harrass and Intimidate Paintiff

CR No: 240082189

**WASHTENAW COUNTY SHERIFF'S OFFICE**

2201 HOGBACK RD.
ANN ARBOR MI 48105
734-973-4655



Jerry L. Clayton Sheriff

Case Report**Administrative Details:**

CR No 240082189	Subject
Report Date/Time 10/25/2024 18:27	Occurrence Date/Time 10/25/2024 18:27
Location 1173 HUNTER AVE	Call Source PHONE
Dispatched Offense 5311 Disorderly Conduct	Verihed Offense C3324 Suspicious Circumstances
County 81 - Washtenaw	City/Twp/Village 20 - Ypsilanti Twp
Division Station 2	

Action Requested:

<input type="checkbox"/> Arrest warrant	<input type="checkbox"/> Review only
<input type="checkbox"/> Search warrant	<input type="checkbox"/> Forfeiture
<input type="checkbox"/> Juvenile petition	<input type="checkbox"/> Other

Narrative:**CFS Narrative By: WDEARLEYJ (02899)**

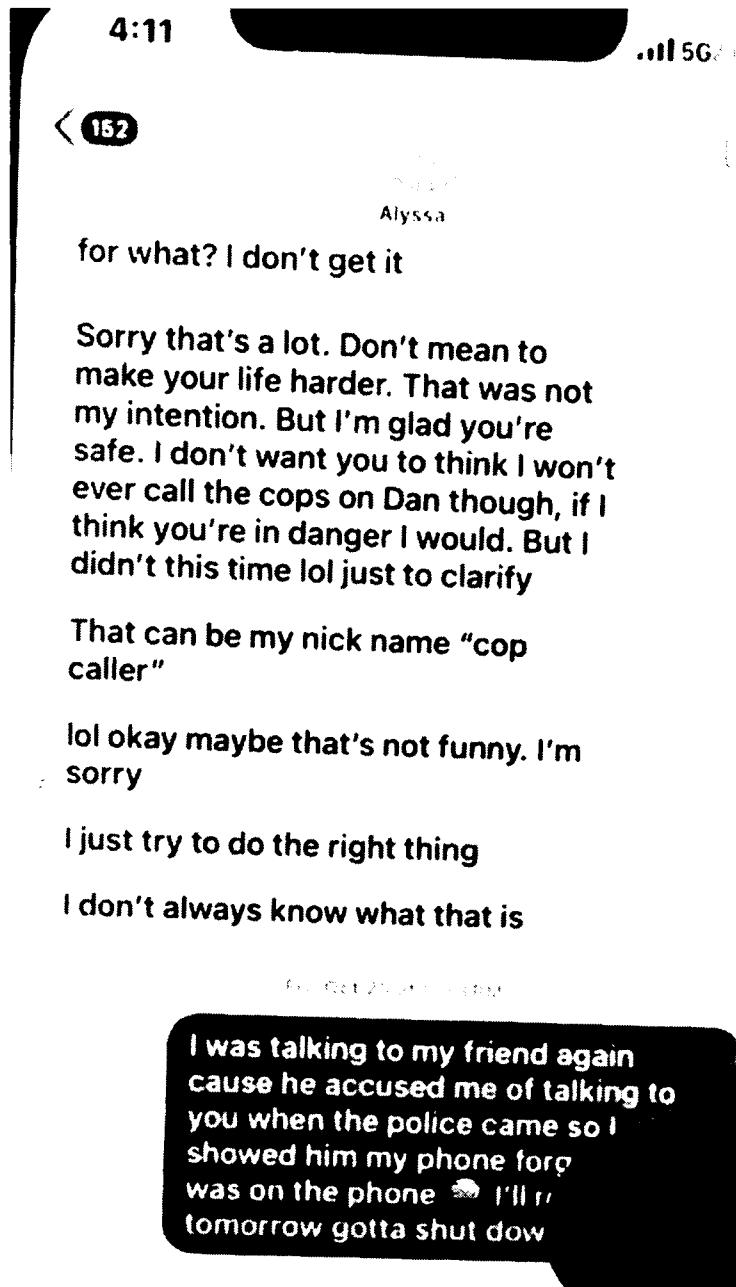
WDHILOBUKT - 18:27:21 - TOW BEAT: WALL WDHILOBUKT - 18:27:21 - DANIEL MCGOO,
 [REDACTED] - POSS AT ADDRESS CAUSING ISSUES WITH MOTHER IN LAW WDDAILEYD -
 18:33:31 - MCGOUGH/DANIEL// WM [REDACTED] LSW PLAID GRY & BLU SHIRT, DARK GRN
 PANTS [REDACTED]
 [REDACTED]
 [REDACTED]

We spoke with mother and she stated all is well. They believe Daniel's child's mother has been calling the police on him. There were no signs of aggression between Daniel and his mom.

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Submitted By: **Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]**313-348-0459 | dryan616@icloud.com

10/25/2024 Message from Defendant Alyssa McCloskey Confessing her Malicious Intent



This message was sent by Defendant McCloskey shortly after she and her husband placed three separate calls to law enforcement on Plaintiff in one day.

In the message, Defendant McCloskey jokingly refers to herself as "the cop caller," and admits uncertainty in her actions, stating: "I don't always know what that is."

Her dismissive attitude toward involving law enforcement without cause highlights her reckless behavior and suggests an intent to alienate Plaintiff from his child. These actions not only demonstrate Defendant McCloskey's legal incompetence but also exacerbate the harm done to Plaintiff and the child's best interests by repeatedly involving the police without justification.

10/25/2024 Message from Defendant Alyssa McCloskey

4:11

< 152

Alyssa

couldn't go to Duncan's if he didn't leave RIGHT THEN.

And I was like no you're not gonna use that manipulation bs Simon's going to go if he wants to be done with stem I can bring him by after it's done

And then he was like no we're leaving and grabbed Simon and I was like the f you are

And I asked Simon if I was right in grabbing him when dad did, because I don't want to do that if he doesn't want me to of course and he said yes and was thankful. We had to play tug of war with Simon. Like just makes me sick that he couldn't sit down like a human and talk to me about it and reason it out with me. Just wants to stomp his feet and demand stuff for what? I don't get it

Sorry that's a lot. Don't mean to make your life harder. That was not my intention. But I'm glad you're safe. I don't want you to think I won't ever call the cops on Dan though, if I think you're in danger I would. But I didn't this time lol just to clarify

That can be my nick name "cop caller"

In this message, Defendant Alyssa McCloskey admits to physically harming the child and engaging in a "tug of war" with him when he attempted to leave with plaintiff. This admission of physical force, in response to the child's desire to leave outlines Defendant McCloskey's wrongful actions, as she resorted to physical control rather than handling the situation in a calm and responsible manner. Her behavior demonstrates an utter lack of appropriate judgment and discernment in situations that require a measured response, particularly when interacting with a child.

Furthermore, Defendant McCloskey's own words reveal her uncertainty about the appropriateness of her actions. She explicitly asks our 7-year-old if she was "right in grabbing him," underscoring her admission of indecision and lack of confidence in her choices. This is a direct admission of her inability to properly evaluate and handle delicate matters regarding the Child's well-being and emotional state.

These actions, combined with her previous pattern of involving law enforcement unnecessarily, underscore the clear lack of judgment and responsibility required for making critical decisions regarding a child's welfare. Given her admission of physical force, her ongoing inability to act appropriately in emotionally charged situations, and her reliance on a 7-year-old child for validation, Defendant McCloskey has proven herself legally incompetent to make important decisions affecting Simon's life and best interests.

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]

313-348-0459 | dryan616@icloud.com

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10/25/2024 – State Police Report and Childs Disclosure of Abuse by Mother Preceding Ex Parte Request

MICHIGAN DEPARTMENT OF STATE POLICE		ORIGINAL DATE Sun, Nov 03, 2024		INCIDENT NO 012-0008577-24	
ORIGINAL INCIDENT REPORT		TIME RECEIVED 1440		FILE CLASS 98006	
		WORK UNIT MSP BRIGHTON POST		COUNTY WASHTENAW	
COMPLAINANT: DANIEL RYAN MCGOUGH				TELEPHONE NO: (313) 348-0459	
ADDRESS: STREET AND NO 1173 HUNTER AVE		CITY: YPSILANTI		STATE: MI	ZIP CODE: 48198
INCIDENT STATUS: CLOSED					

CIVIL / CUSTODY**SUMMARY:**

I was dispatched to [REDACTED] for a civil complaint that occurred at the venue. I contacted the complainant, Daniel McGough. Daniel informed me at the below listed date and time he was doing a custody exchange with [REDACTED]. Daniel was supposed to be picking up [REDACTED]. [REDACTED] did not allow Daniel to pick up [REDACTED]. Daniel informed me [REDACTED] grabbed [REDACTED] arm and dragged him away. [REDACTED] corroborated the statement. Daniel stated he just wanted to report the incident. I informed Daniel that custody disputes are a civil issue and a mother grabbing her child's arm is not a crime. I cleared the scene without incident.

VENUE:

WASHTENAW COUNTY
7425 WILLIS RD
AUGUSTA TWP, MI

DATE & TIME:

ON OR AFTER: FRI, OCT 25, 2024 AT 1730

COMPLAINANT / FATHER:

NAM: DANIEL RYAN MCGOUGH			RAC: WHITE	ETH:
BIR:		DIR:	SEX: MALE	DL: MI/M220135755954
NBR: 1173			DOB: 12/16/1988	SSN:
STR: HUNTER			HGT: 5'10"	SI: /
SFX: AVENUE			WGT: 210	FBI:
CTY: YPSILANTI	ST: MI		HAI:	MNU:
TXH:	ZIP: 48198		EYE: Blue	PR:
TXW:				
MB: (313) 348-0459				
SMT:				

PAGE: 1 of 2
INVESTIGATED BY: POHL, JOSHUA, 1209, TROOPER
PRINTED: 12/6/2024 15:25

INVESTIGATED BY:**REVIEWED BY:**

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]

313-348-0459 | dryan616@icloud.com

11/19/2024 Frivolous Ex Parte Request Based on Defendants Own Manufactured Law Enforcement Activity

STATE OF MICHIGAN 22 ND JUDICIAL CIRCUIT FAMILY DIVISION WASHTENAW COUNTY	AFFADAVIT IN SUPPORT OF REQUEST FOR EX PARTE ORDER	CASE NO. <u>19-2734-DC</u> HON. <u>Judge Conlin</u>
P.O. Box 8645, Ann Arbor, MI 48107-8645		Court telephone number: (734) 222-3001

Plaintiff's name, address and telephone number: Alyssa McCloskey
6988 McKeen Rd Lot 72
Ypsilanti MI 48197
734-927-2196

V

Defendant's name, address and telephone number: Daniel McGough
1173 Hunter Ave Ypsilanti MI
48197
313-938-8092

1. I am the Plaintiff in this case, and affirm the following statements.
2. If sworn as a witness, I can testify competently to the facts stated in this affidavit, because I have personal knowledge of them.
3. The following events have occurred that have led me to ask for an ex parte Court order.

See attached. Defendant has also been arrested on two
of his parenting days before pickup resulting in potential
negligence i.e. getting left at bus stop.

4. The Court order that I have requested will govern the following matters:

parenting time, Suspension until ~~court~~ defendant's Criminal
Case has Final Judgement.

5a. Irreparable harm will result from the delay required to give notice of my request because of these specific facts: threats made to child by defendant
as well as current charges make it clear defendant is unsafe,
Has poor Judgment, and may be suffering from mental illness.

OR

5b. Notice itself will result in adverse action before an order can be issued, because of these specific facts: _____

Alyssa McCloskey
Signature

11-19-2024
Date

Subscribed and sworn to before me on 11/19/24 (date)
in WASHTENAW County, Michigan.
My commission expires on _____ (date).
Signature of Notary: [Signature]
DEPUTY

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]

313-348-0459 | dryan616@icloud.com

11-19-2024 Ex Parte Suspension Order Entered Without Due Process

STATE OF MICHIGAN JUDICIAL BRANCH COURT OF CLERKS CLERK OF COURT JANUARY COUNTY	EX PARTE ORDER FOR CUSTODY/PARENTING TIME AND/OR CHILD SUPPORT	CASE NO. 11-19-2024 HON. Judge [Signature]
PLAINTIFF'S NAME, ADDRESS AND TELEPHONE [Signature] [Address] [Phone]	V	DEFENDANT'S NAME, ADDRESS AND TELEPHONE number [Signature] [Address] [Phone]

Date of Order: NOV 20 2024

1. The Court has reviewed Plaintiff's request for an ex-parte Order, and the factual statements made in support of that request in the documents submitted.
2. The Court is satisfied that ☒ irreparable injury, loss or damage will result from the delay required to effect notice; and/or that ☐ notice itself will precipitate adverse action before an order can issue.
3. The Court also finds that:
 - ☐ The ex parte order will not change the child(ren)'s established custodial environment; OR
 - ☐ There is clear and convincing evidence that the best interests of the child(ren) require a change in the established custodial environment.

IT IS ORDERED:

Defendant's parenting time is suspended until further order of the Court.

IT IS FURTHER ORDERED THAT a copy of this Order (with attached Notice) and the Motion or Affidavit upon which the Order is based are to be served upon the Defendant, ~~with service of the~~
~~Suspension and Complaint~~


Family Division Judge

Washington
[Signature]

NOV 22 2024

FILED

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Submitted By: **Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]**
313-348-0459 | dryan616@icloud.com

Defendant's Repeated Attempts to Obtain Ex Parte Relief Despite Lack of Legal Merit

STATE OF MICHIGAN WASHTENAW COUNTY TRIAL COURT	ORDER GRANTING / DENYING EX PARTE MOTION and PROOF OF SERVICE	CASE NO. 19-2737 DC Court telephone no. 313.222.3737
Plaintiff's name, address, phone and email		Defendant's name, address, phone and email
Alyssa McCloskey	v	Daniel McGough

ORDER GRANTING / DENYING EX PARTE MOTION

At a session of said court held in the
City of Ann Arbor, County of Washtenaw,
State of Michigan on 5/26/2023

Washtenaw County
Trial Court

MAY 26 2023

PRESENT: HONORABLE PATRICK J. CONLIN, JR.
Circuit Court Judge

FILED

This matter is before the Court on an Ex Parte Motion for Suspension of parenting time

1. The Court has reviewed the motion for an Ex Parte Order, and the factual statements made in support of that motion in the documents submitted.
2. ___ The Court is satisfied that irreparable injury, loss or damage will result from the delay required to effect notice; and / or that notice itself will precipitate adverse action before an order can issue, OR
3. ☒ The Court is **NOT** satisfied that irreparable injury, loss or damage will result from the delay required to effect notice; and / or that notice itself will precipitate adverse action before an order can issue, and the motion can be scheduled for hearing on the regular motion docket.

IT IS ORDERED:

The request for ex parte relief is denied.
Plaintiff may set this matter for hearing with
notice to Defendant.

THE COURT FURTHER ORDERED that a copy of this Order with the attached Notice and the Motion and Affidavit upon which the Order is based are to be served upon the other party. A proof of service shall be filed with the Court.


Hon. Patrick J. Conlin, Jr. 253333

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Submitted By: **Daniel Ryan McGough** C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

Defendant Conlin's imposition of procedural barriers and obstruction of Plaintiff's Access to justice.

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

ALYSSA LEWIS (KNA McCLOSKEY)
Plaintiff,
v

Case No. 19-002734-DC
HON. Patrick J. Conlin, Jr.

DANIEL MCGOUGH,
Defendant.

Veronica J. White (P62684)
Attorney for Plaintiff
455 East Eisenhower, Suite 300, #44
Ann Arbor, Michigan 48108
(734) 761-1286

Daniel McGough
Defendant
1173 Hunter Avenue
Ypsilanti, Michigan 48198
(734) 263-1193

**ORDER AFTER HEARING ON DEFENDANT'S MOTION REGARDING SCHOOL
SELECTION, BODY MODIFICATIONS; DEFENDANT'S OBJECTION TO FRIEND OF
THE COURT RECOMMENDATION; DEFENDANT'S MOTION TO DISSOLVE EX
PARTE ORDER; and PLAINTIFF'S MOTION FOR VEXATIOUS LITIGATOR RELIEF,
ATTORNEY FEES AND COSTS, AND OTHER RELIEF**

Entered: DEC 12 2024

At a hearing held on 12/12/2024, with both parties present in the Courtroom and Plaintiff's counsel present by Zoom (due to illness), after being advised on the record, and for the reasons stated on the record:

1. Defendant's MOTION REGARDING SCHOOL SELECTION, BODY MODIFICATIONS is denied.
2. Defendant's OBJECTION TO FRIEND OF THE COURT RECOMMENDATION is denied and the Friend of the Court's recommendation is adopted.
3. An evidentiary hearing will be hold on 1/13/25 at 1:00 PM for Defendant's MOTION TO DISSOLVE EX PARTE ORDER. *re: Daniel McGough*


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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

Defendant Conlin's imposition of procedural barriers and obstruction of Plaintiff's Access to justice.

4. In reference to Plaintiff's MOTION FOR VEXATIOUS LITIGATOR RELIEF,
ATTORNEY FEES AND COSTS, AND OTHER RELIEF:

- i. Defendant must have judicial approval to file a motion;
- ii. Defendant must post a \$2,000 bond when the approved motion is filed;
- iii. Defendant is ordered to pay \$6,000 in attorney fees in the amount of \$500 per month until it is paid in full. The first payment is due on January 1st, 2025, and shall be due on the 1st of the month each month thereafter until the balance is paid in full.

5. All other Orders not inconsistent with this ORDER remain in full force and effect.


HON. Patrick J. Conlin, Jr. (P56333)
Washtenaw County Circuit Court Judge

Prepared by:

/s/ Veronica J. White
Veronica J. White (P62684)
Attorney for Plaintiff

**Defendant Alyssa McCloskey's Petition for Contempt Against Plaintiff
Requesting Civil and Criminal Charges (Dec 17, 2024)**

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY	MOTION, AFFIDAVIT, AND/OR ORDER TO SHOW CAUSE	CASE NO. and JUDGE 19-2734-DC HON. Patrick J. Conlin, Jr.
Court address 101 E. Huron St. POB 8645, Ann Arbor, MI 48107-8645		Court telephone no. 734.222.3961
Plaintiff's Petitioner's name, address, and telephone no. Alyssa McCloskey		Defendant's/Respondent's name, address, and telephone no. Daniel McGough
In the matter of _____		

An affidavit and a motion is not required when the show cause is issued on the judge's own motion.

MOTION AND AFFIDAVIT

1. I am interested in this matter as Plaintiff's Counsel
2. Daniel McGough ☒ has failed to comply with an order dated 12.12.2024
 Name (type or print) ☐ is in contempt for _____
 State with particularity admissible facts establishing this motion
 Defendant has filed motions without approval of the Court or posting bond, one of which he has set for hearing on 01.15.2025
 The Motion set for hearing on 01.15.2025 and the relevant ORDER is attached to this MOTION.

3. I request an order directing Daniel McGough to show cause why
 Name (type or print)
- ☒ a. he/she should not be found in ☒ civil ☒ criminal contempt of court. Washtenaw County
☐ b. judgment should not be entered against him/her (as surety/agent) for the full amount of recognizance. **DEC 19 2024**
☐ c. judgment should not be entered against him/her for failure to file a garnishee disclosure
☐ d. other _____ **FILED**

4. This affidavit is made on my personal knowledge and, if sworn as a witness, I can testify competently to the facts in this motion and affidavit.

Signature

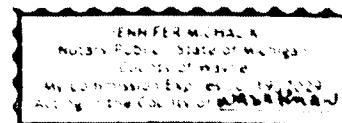
Subscribed and sworn to before me on 12.17.24
 Date

My commission expires on 7.19.29
 Deputy clerk/Notary public signature
Jennifer Michalik
 Name (type or print)

Notary public, State of Michigan, County of Wayne Acting in the County of Washtenaw
 This notarial act was performed using an electronic notarization system or a remote electronic notarization platform.

Approved: SCAG
 Form MC 224 Rev. 1-24
 MC 105 (10/12), MC 2 (10/18), MC 2 (10/18), MC 3 (10/18)
 MC 3 (10/18), MC 3 (10/18), MC 3 (10/18), MC 3 (10/18)
 MC 3 (10/18), MC 3 (10/18), MC 3 (10/18), MC 3 (10/18)
 Page 1 of 2

Distribute form to
 Court
 Subject
 Return



Evidence of ongoing irreparable harm: loss of employment opportunities due to Defendants' actions.

02/26/2025

DANIEL RYAN MCGOUGH

1173 HUNTER AVE

We regret to inform you that [REDACTED] is unable to consider you further for employment, continued employment, and/or promotion.

This decision was based in whole or in part on information contained in a report from the HR Management Group, Inc., A division of American Society of Employers (ASE). Please be advised that ASE did not make this employment decision and is unable to supply you with specific reasons why the decision was made.

Under Section 612 of the Fair Credit Reporting Act (FCRA), you have the right to obtain a free copy of the report if you submit a written request to the agency identified above no later than 60 days after you receive this notice. Under Section 611 of the FCRA, you also have the right to dispute with the consumer reporting agency the accuracy or completeness of any information in the report. You may contact ASE at the following address and/or telephone number:

HR Management Group, Inc., a division of ASE
5505 Corporate Dr. Ste. 200
Troy, MI 48098
Phone (800) 353-4500

Please be prepared to provide proper identification to ensure confidentiality. If you wish to dispute the accuracy of the information contained in a credit report, you must contact the credit bureau directly at the following address and/or telephone:

Trans Union
2 Baldwin Place
P.O. Box 1000
Chester, PA 19022
Phone (888) 888-4213
www.transunion.com

Sincerely,

SARAH

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Submitted By: **Daniel Ryan McGough** C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

Evidence of ongoing irreparable harm: loss of employment opportunities due to Defendants' actions.


To: Daniel McGough

 Add

Hi Daniel,

I was able to get feedback and have an additional question for you. Are you able to share a police report with us to help determine how we can move forward?

Sarah 
Mgr, Human Resources



Friend of the Court's Indifference to Continued Custodial Interference (March 17, 2025).

WASHTENAW COUNTY TRIAL COURT - FAMILY DIVISION



OFFICE OF THE FRIEND OF THE COURT

Washtenaw County Court 100
1001 Piquette P.O. Box 9045
Ann Arbor MI 48106-9045
Phone: (313) 222-3000
Fax: (313) 222-3032

March 17, 2025

Daniel McGough
*Confidential Address

RE: LEWIS v MCGOUGH
Case Number 2019-002734-DC

Dear Mr. McGough

A parenting time denial complaint was submitted on March 13, 2025, alleging a denial of time on March 8, 2025, from 10:00 AM to 11:00 AM. After reviewing the complaint and the response, it does not appear there is a violation of the court order. The controlling order in this case grants parenting time by video on this day from 10:00 AM to 11:00 AM, which will be facilitated by Plaintiff's husband. The complaint does not allege that this video call was denied. There is nothing in your order preventing redirection of conversation topics deemed appropriate by the facilitator of these phone calls. The court speaks through its orders. Friend of the Court Enforcement Division is responsible for enforcing denials of parenting time but does not address alleged violations of parenting time conditions.

Your parenting time complaint is denied, and Friend of the Court will take no action at this time. If either party disagrees with the Friend of the Court's position, you must file a motion with the court.

This letter resolves the parenting time denial complaint dated March 13, 2025.

Sincerely,

Erin Wheeler

Parenting time Enforcement Division
Washtenaw County Friend of the Court

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

Page 54 of 60

Veteran's Statement on Oaths of Office, Lawful Authority, and Constitutional Accountability

As a United States Army veteran who has sworn an oath to support and defend the Constitution of the United States "against all enemies, foreign and domestic," Plaintiff approaches this matter with a profound respect for the rule of law, lawful authority, and the principles of public trust and accountability.

It is with deep personal concern—not merely as a litigant but as a former sworn servicemember—that Plaintiff notes the alarming irregularities in the oaths of office for several officials central to this case, including Defendants Conlin, Slay, Simpson, Savit, and Londy. Publicly available versions of these oaths reveal the absence of official seals, appointing signatures, or proper certifications—calling into serious question the constitutional legitimacy of the authority under which these individuals have acted.

These failures are not isolated technical deficiencies. They reflect a broader pattern of misconduct and systemic abuse as outlined throughout this Complaint. The absence of lawfully executed oaths parallels the Defendants' continuous efforts to obstruct justice, suppress exculpatory evidence, and maliciously pursue wrongful criminal convictions against Plaintiff—all while shielding their own misconduct from public scrutiny and accountability.

This disregard for lawful authority has come at devastating personal cost. Plaintiff and his family have endured unbearable emotional stress and hardship throughout these proceedings, compounded by the shocking reality that the original complainant in Plaintiff's criminal matter admitted their allegation was merely a "joke." Yet despite the clear absence of probable cause, and despite Plaintiff's demonstrated innocence, Washtenaw County officials have persisted in pursuing baseless charges with the goal of incarcerating Plaintiff and insulating their own unlawful actions from examination.

The intentional pursuit of a guilty verdict, without evidence, and at the expense of Plaintiff's liberty, livelihood, parental rights, and fundamental dignity, paints a sobering picture of what is at stake: a systemic failure where public officials, charged with upholding the Constitution, have instead weaponized the machinery of justice for personal and institutional protection.

As a veteran who once stood ready to defend the very freedoms and principles now being violated by these officials, Plaintiff brings forward this statement to underscore the gravity of these violations—and to insist that no individual, regardless of office, is above the Constitution they are sworn to serve.

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Submitted By: **Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]**

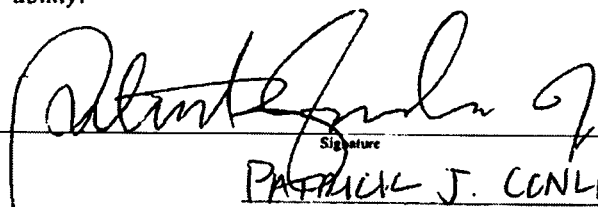
313-348-0459 | dryan616@icloud.com

Oaths of Office for Defendants Conlin, Slay, Simpson, Savit, and Londy

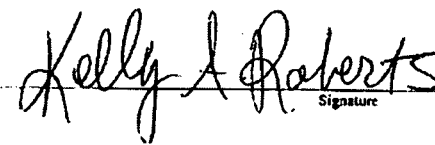
OATH OF OFFICE

STATE OF MICHIGAN }
County of Washtenaw } SS.

*I do solemnly swear that I will support the Constitution of the United States and the
Constitution of this State, and that I will faithfully discharge the duties of the office of*
Circuit Court Judge
according to the best of my ability.


Signature
PATRICK J. CONLIN, JR
Name Printed or Typed

Sworn to and subscribed before me this 22nd day of December
2014.


Signature

Title

Name Printed or Typed

Name of Notary: Kelly A. Roberts
County: Washtenaw
Commission
Expires: 1/8/2018

* This information is requested if Oath of Office is taken before
someone other than a notary public.

** When filing with the Secretary of State, original signatures are required.

Form 32-5/99-5A1

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Submitted By: **Daniel Ryan McGough** C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

Oaths of Office for Defendants Conlin, Slay, Simpson, Savit, and Londy

Londy Ashley
Surname Given Name Middle



APPOINTMENT OF Ashley Londy

Assistant Prosecutor

STATE OF MICHIGAN)
County of Washtenaw) ss By virtue of the power in me vested by the Statute in such case made and provided
I the undersigned Prosecutor of the said County of Washtenaw, do hereby constitute and appoint the above
named person as Assistant Prosecutor of said County of Washtenaw, and to hold said office during my
pleasure. Given under my hand at Ann Arbor in said County, this day of

Signature of Appointing Officer

OATH OF DEPUTY Ashley Londy

Assistant Prosecutor

STATE OF MICHIGAN)
County of Washtenaw) ss I do solemnly swear that I will support the Constitution of the United States and the
constitution of this state, and that I will faithfully discharge the duties of
Assistant Prosecuting Attorney in and for the County of Washtenaw, State of Michigan, to the best
of my ability.

Subscribed and sworn to before me, this 6th day of January, 2025

Anna E. Wernick
Anna E. Wernick

Revoked

By _____
Signature of Revoking Officer

Oaths of Office for Defendants Conlin, Slay, Simpson, Savit, and Londy

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Submitted By: **Daniel Ryan McGough** C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

Oaths of Office for Defendants Conlin, Slay, Simpson, Savit, and Londy

Savit Eli
Surname Given Name Middle



APPOINTMENT OF Eli Savit

Washtenaw County Prosecuting Attorney

STATE OF MICHIGAN)
County of Washtenaw) ss. By virtue of the power in me vested by the Statute in such case made and provided
I, the undersigned, Prosecutor of the said County of Washtenaw, do hereby constitute and appoint the above
named person as Washtenaw County Prosecuting Atto of said County of Washtenaw, and to hold said office during my
pleasure. Given under my hand at Ann Arbor in said County, this 19th day of DECEMBER, 2024

Signature of Appointing Officer

OATH OF DEPUTY Eli Savit

Washtenaw County Prosecuting Attorney

STATE OF MICHIGAN)
County of Washtenaw) ss. I do solemnly swear that I will support the Constitution of the United States and the
constitution of this state, and that I will faithfully discharge the duties of
in and for the County of Washtenaw, State of Michigan, to the best
of my ability

Subscribed and sworn to before me, this

19th day of DECEMBER, 2024

Revoked

By _____
Signature of Revoking Officer

Oaths of Office for Defendants Conlin, Slay, Simpson, Savit, and Londy

OATH OF OFFICE

STATE OF MICHIGAN

County of Washtenaw

I do solemnly swear that I will support the Constitution of the United States and the Constitution of this State, and that I will faithfully discharge the duties of the office of

22nd Circuit Court Judge
according to the best of my ability.

Ariane Elizabeth Slay
Signature**

Ariane Elizabeth Slay
Name - Printed or Typed

Sworn to and subscribed before me this 28th day of November, 2022

[Signature]
Signature of Officer Administering Oath or Notary Public**

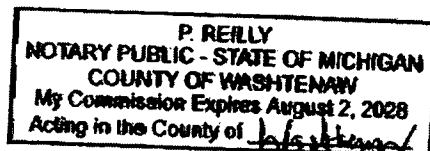
Deputy Clerk
Title*

Name of Notary:

County:

Commission:

Expires:



*This information is requested if Oath of Office is taken before someone other than a notary public.

**When filing with the Secretary of State, original signatures are required.

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Submitted By: Daniel Ryan McGough C/O PO Box 970081 Ypsilanti MI [48197]
313-348-0459 | dryan616@icloud.com

Oaths of Office for Defendants Conlin, Slay, Simpson, Savit, and Londy

J. Cedric Simpson


OATH OF OFFICE

STATE OF MICHIGAN

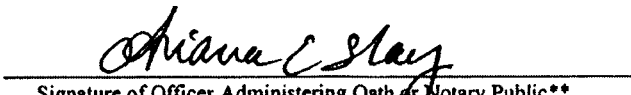
County of Washtenaw

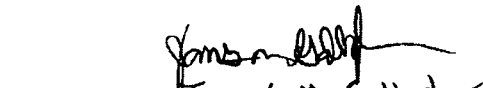
I do solemnly swear that I will support the Constitution of the United States and the Constitution of this State, and that I will faithfully discharge the duties of the office of
Judge of the 14A Judicial District Court

according to the best of my ability.


Signature**
J. Cedric Simpson
Name – Printed or Typed

Sworn to and subscribed before me this 3rd day of December, 2024


Signature of Officer Administering Oath or Notary Public**
Judge Arianne E. Slay, 22nd Judicial Circuit Court
Title*


Name of Notary: **James M. Gallagher**
County: **Washtenaw**
Commission: **Michigan**
Expires: **7-10-25**

*This information is requested if Oath of Office is taken before someone other than a notary public.

**When filing with the Secretary of State, original signatures are required.

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